

EXHIBIT F

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10 RBS Securities Inc. (f/k/a Greenwich Capital
11 Markets, Inc.) and RBS Acceptance Inc. (f/k/a
12 Greenwich Capital Acceptance, Inc.)

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 NATIONAL CREDIT UNION
16 ADMINISTRATION BOARD, as
17 Liquidating Agent of Western Corporate
18 Federal Credit Union,

17 Plaintiff,

18 vs.

19 RBS SECURITIES INC., et al.,

20 Defendants.

Case No. CV 11-05887 GHW (JEMx)

**DEFENDANT RBS SECURITIES
INC.'S FIRST SET OF REQUESTS
FOR PRODUCTION OF
DOCUMENTS TO NATIONAL
CREDIT UNION
ADMINISTRATION BOARD**

Complaint Filed: July 18, 2011
First Amended Complaint Filed:
August 19, 2013

Judge : Hon. George H. Wu
Courtroom : 10

1 Pursuant to Federal Rule of Civil Procedure 34, RBS Securities Inc. requests
2 that Plaintiff National Credit Union Administration Board produce the following
3 categories of documents within thirty days of service hereof at the offices of Kirkland
4 & Ellis LLP, 333 South Hope Street, Los Angeles, California 90071. For definitions
5 and instructions relating to these requests, please refer to the section below entitled
6 "Definitions and Instructions."

7 REQUESTS

- 8 1. All documents concerning each of the Trusts and each of the Certificates.
- 9 2. All documents supporting your contention that RBS made false or
10 misleading representations or omissions, including in prospectuses and prospectus
11 supplements, regarding the Certificates or Trusts.
- 12 3. All of your communications with WesCorp concerning any of the Trusts
13 or the Certificates.
- 14 4. All of your communications with WesCorp concerning any Residential
15 Mortgage-Related Security.
- 16 5. All documents provided to you by WesCorp concerning any Residential
17 Mortgage-Related Security or any of the Trusts or Certificates.
- 18 6. All documents that you provided to WesCorp concerning any Residential
19 Mortgage-Related Security or any of the Trusts or Certificates.
- 20 7. All reports, recommendations, and analyses that you received from
21 WesCorp, or provided to WesCorp, concerning any Residential Mortgage-Related
22 Security or any of the Trusts or Certificates.
- 23 8. All documents concerning any of the mortgage loans in the collateral
24 pool of any of the Trusts or backing any of the Certificates.
- 25 9. All documents concerning the loan-to-value ratios of any of the mortgage
26 loans in the collateral pool of any of the Trusts or backing any of the Certificates.

1 10. All documents concerning an appraisal or other valuation of any property
2 that is or was subject to any of the mortgage loans in the collateral pool of the Trusts
3 or backing any of the Certificates.

4 11. All documents concerning the credit ratings of any of the Certificates.

5 12. All of your or WesCorp's communications with credit ratings agencies,
6 including S&P, Moody's or Fitch, concerning the credit rating of any of the
7 Certificates or any other certificate issued by the Trusts.

8 13. All documents concerning the owner-occupancy status of any property
9 that is or was subject to any of the mortgage loans in the collateral pool of any of the
10 Trusts or backing any of the Certificates.

11 14. All documents concerning or considered in your or WesCorp's decision
12 to acquire, hold or dispose of any of the Certificates.

13 15. All documents concerning any investigation, evaluation or risk
14 assessment concerning any of the Certificates or any of the mortgage loans in the
15 collateral pool of any of the Trusts.

16 16. All analyses, valuations, studies or investigations concerning or
17 considered in your or WesCorp's decision to acquire, hold, or dispose of any of the
18 Certificates.

19 17. All documents concerning your or WesCorp's reliance upon any
20 registration statement, prospectus supplement, or any other documents or information
21 in deciding whether to purchase, hold, or sell any of the Certificates.

22 18. All documents concerning any investment that WesCorp considered
23 making as a complete or partial alternative to your or WesCorp's investment in any of
24 the Certificates.

25 19. All documents concerning your or WesCorp's monitoring of the
26 performance and developments concerning any of the Certificates.

27 20. All documents concerning your or WesCorp's evaluation of the
28 performance and developments concerning any of the Certificates.

1 31. All documents concerning any board of directors or internal committee
2 meeting at which WesCorp's purchase, holding, or divestiture of Residential
3 Mortgage-Related Securities was discussed, including minutes, notes, agendas and
4 related presentations.

5 32. All documents concerning any board of directors or committee meeting
6 at which the Trusts or Certificates was discussed, including minutes notes, agendas
7 and related presentations.

8 33. Documents sufficient to identify each committee member or director who
9 voted in favor of or recommended WesCorp's investment in or purchase of the
10 Certificates.

11 34. Documents sufficient to identify each committee member or director who
12 voted against or recommended against WesCorp's investment in or purchase of the
13 Certificates.

14 35. Documents sufficient to identify each of WesCorp's employees, officers
15 and directors who reviewed a registration statement, a prospectus supplement, or any
16 other document that you or WesCorp relied upon in purchasing the Certificates.

17 36. All of your or WesCorp's internal communications concerning RBS, the
18 Certificates or the Trusts.

19 37. All of WesCorp's communications with the National Credit Union
20 Administration Board concerning Residential Mortgage-Related Securities, the Trusts,
21 the Certificates, or RBS.

22 38. All documents that you referenced, consulted, reviewed, or relied on in
23 preparing the Complaint.

24 39. To the extent not encompassed by the above requests, all documents
25 supporting any of the allegations of your Complaint.

26 40. To the extent not encompassed by the above requests, all documents
27 concerning your or WesCorp's alleged damages.
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